



S P I R E   L A W

Ian Smith  
ian@spirelawfirm.com  
407.494.0135

Spire Law, LLC  
2572 W State Rd 426  
Suite 2088  
Oviedo, FL 32765

1 East Broward Boulevard  
Suite 700  
Ft. Lauderdale, FL, US 33301

[spirelawfirm.com](http://spirelawfirm.com)

June 18, 2025

**VIA EMAIL blaggards@verizon.net and CERTIFIED MAIL RETURN**  
**RECEIPT REQUESTED**

**Blaggards III Restaurant Corp.**

William "Liam" Lynch

8 W 38th Street 1

New York NY, 10018

+1 203-450-2710

blaggards@verizon.net

Re: *Sigaran v. Blaggards III Restaurant Corp. et al* (1:23-cv-11046-ER)

Dear Liam:

On May 23, 2025, I advised you that I met with the Court on that day and that the Court had authorized us to withdraw. At that time, a copy of the Court's Text Order<sup>1</sup> was provided to you as well as the instructions we were required to provide you.

Spire Law, PLLC and I are hereby giving you notice that we are withdrawing as counsel for Blaggards III Restaurant Corp., and William Lynch in the above-referenced civil action. You, Liam Lynch, may either retain new counsel or inform the Court that you will represent yourself by June 27, 2025 (this is only for you as an individual not the company).

---

<sup>1</sup> Docket Text:

**Minute Entry for proceedings held before Judge Edgardo Ramos: Pre-Motion Conference held on 5/23/2025 by telephone. Plaintiff's counsel present. Ian Smith, counsel for Defendants Blaggards and Lynch, present. Smith requests one week to attempt to reach a resolution with the Plaintiff. If no resolution is reached, then he will withdraw as counsel. Smith was directed to (1) inform Defendants, in writing, of his withdrawal; (2) advise Blaggards that it cannot represent itself and must retain new counsel by June 27, 2025; and (3) Lynch may either retain new counsel or inform the court that he will represent himself by June 27, 2025. Smith was further directed to file proof of service of the letter on ECF. Plaintiff was directed to provide the Court with a status update by June 27, 2025. (jar)**



Please be advised that Blaggards III Restaurant Corp. may not represent itself in this matter and must retain new counsel by **June 27, 2025**. Because Defendant Blaggards III Restaurant Corp. is a corporation, it may only be represented in court by an attorney, who must sign all pleadings and papers submitted to the Court; a corporate officer may not represent the corporation in court unless that officer is an attorney licensed to practice law in the State of New York or has been admitted pro hac vice in the case; and failure to comply with this rule could result in a default judgment against the corporation;

You have the burden of keeping the Court informed of a location where notices, pleadings, or other papers may be served;

You have the obligation to prepare for trial or hire new counsel to prepare for trial, when the trial date has been scheduled and to conduct and respond to discovery or motions in the case;

If you fail or refuse to satisfy court-related obligations, you may suffer adverse consequences;

At present, the deadlines are as follows:

July 2, 2025- Deadline for expert reports to be served.

August 1, 2025- Deadline for rebuttal expert reports to be served.

September 1, 2025- Discovery Ends, Deadline for expert depositions to be completed.

September 3, 2025- Case Management Conference at 11 am.

The service of notices may be made upon you at the above-referenced last known addresses;

Opposing counsel's contact information is:

**Colin James Mulholland**  
 Law Offices of Colin Mulholland  
 36-36 33rd Street  
 Suite 308  
 Astoria, NY 11106

The Clerk of Court's contact information is:

Tammi M. Hellwig, Clerk of Court  
 Southern District of New York  
 40 Foley Square  
 New York, NY 10007  
 212-805-0136



347-687-2019  
Email: cmulhollandesq@gmail.com

If you have any questions about the details of these obligations, please feel free to contact our office at (212) 335-0018 or via email at [ian@spirelawfirm.com](mailto:ian@spirelawfirm.com).

Sincerely,

A handwritten signature in black ink that reads "Ian E. Smith".

Ian E. Smith, Esq.  
Partner, Spire Law, LLC